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November 13, 2024

**BY ECF**

Honorable Judge Dale E. Ho  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Court Room 905  
New York, NY 10007

Re: *Spin Master, Ltd. v. Aomore-US*, Case No. 23 Civ. 7099 (DEH),  
**Renewed Motion for Preliminary Injunction**

Dear Judge Ho:

We write to request an order approving a procedure for renewal of plaintiff Spin Master, Ltd.'s motion for a preliminary injunction as against Leqiong, Monkki, Onecemore, Yucmed, and Chenghai Lucky Boy Toys (the "Represented Defendants"). Spin Master's original motion (ECF Nos. 32 et seq.) was fully briefed, and the Court heard argument on the motion on January 12, 2024. The Court subsequently denied the motion without prejudice to renewal because the Court held that the Represented Defendants had not been properly served. (ECF No. 126.) Service of process is now complete (*see* Certificates of Service filed as ECF Nos. 134-35).

While the parties could file entirely new briefs and evidentiary material, that seems inefficient and contrary to the spirit of the Court's prior order that directed defendants not to repeat arguments that had been made in a prior motion. *See* ECF 78.

Spin Master therefore proposes to renew its motion for preliminary injunction by filing a 3-page letter motion that incorporates by reference the parties' prior briefing, together with (1) a declaration addressing the ongoing sales of the Accused Products, and (2) a proposed order. In addition, Spin Master proposes the following briefing schedule:

Spin Master's 3-page Letter Motion: No later than November 15;

Defendants' 3-page Letter Response: No later than November 22; and

Spin Master's 3-page letter Reply: No later than November 29.

Spin Master reached out to the Represented Defendants on November 12 and November 13 to get their consent to this proposed procedure and schedule. They responded after the close of business on November 13 stating that they would consider the request, with no timeline for a response.

Respectfully submitted,

/s/ *Andrew D. Skale*

cc: Counsel of Record (via ecf)